

Region 3 GPRA 2020 Baseline RCRA Corrective Action Facility

CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.

**7515 Harvest Road
Prince George, VA 23875
Congressional District 4
EPA ID No. VAD988175055
Last Updated 01/08/2009**

Topographic Location Map



Current RCRA CA Activities

Corrective Action (CA) site investigations and any necessary clean up activities at the Clean Harbors Environmental Services, Inc. (Clean Harbors) facility in Prince George, Virginia, are being implemented in accordance with the conditions and requirements of the EPA Region III Facility Lead Corrective Action Program under the Resource Conservation and Recovery Act (RCRA). On January 5, 2007, Clean Harbors submitted a letter of commitment and entered into a Facility lead Agreement (FLA) with the U.S. EPA to address CA at the facility site under the RCRA.

The U. S. EPA has delegated the Virginia Department of Environmental Quality (DEQ) as the lead agency for technical and administrative oversight of Corrective Action (CA) activities at Clean Harbors under the FLA under the RCRA.

The FLA approach encourages RCRA Corrective Action facilities to take the lead in addressing corrective action using a generic, non-enforceable, agreement which includes the same requirements, and relies on the same scope of work and policy as a permit or an order. By agreeing to participate in the Facility Lead Corrective Action Program with EPA, the Facility commits to:

- Determine the extent and sources of all releases of hazardous wastes or hazardous waste constituents at or from the Facility using quality data.
- Evaluate and meet EPA's Environmental Indicators.
- Perform interim measures (IMs) at the Facility to prevent or mitigate unacceptable threats to human health and the environment by: 1) controlling human exposures, and 2) controlling migration of any groundwater contamination at or from the Facility from releases of hazardous wastes or hazardous constituents.
- Conduct effective public involvement.
- Communicate regularly to EPA, the State, and the community on corrective action progress at the facility.

Under the FLA, the EPA agrees to provide an appropriate level of oversight to assist the facility to meet these goals. As noted, the EPA has delegated the primary oversight responsibilities for this site to the DEQ.

The Clean Harbors facility is on the RCRA Corrective Action GPRA Baseline List (2020 CA Universe List) and was ranked as a low priority site under the National Corrective Action Prioritization System (NCAPS).

Site Description

The facility is located at 7515 Harvest Road, in Prince George, Virginia, and began operation as Belpar Environmental in the 1980's, and was acquired by Chemical Waste Management (CWM) of Oak Brook, Illinois. CWM submitted a Hazardous Waste Permit Part A Application in January 1992. CWM operations at the site included lab packaging, underground storage tank removal and installation services, processing, storage, and transportation of waste, and acceptance of waste oil, which was subsequently shipped off-site for treatment and/or disposal.

Clean Harbors began leasing the property in September 1994, when it purchased the operations from CWM. The 3.29-acre property is leased from A.A. Forbes of Prince George, Virginia. Clean Harbors operated the facility under Interim Status, and submitted a Part B Application in February 1997. During Clean Harbor's operation, the site has been used as a hazardous and non-hazardous waste storage and treatment facility. Clean Harbors subsequently withdrew the RCRA

Part B Application on August 27, 2001, after undergoing RCRA closure of the tank farm, and operated as a wastewater treatment facility regulated under the Clean Water Act (CWA) until 2004. The facility site is currently used as a service center for oil and hazardous material spill response activities and scheduled environmental services.

The site is located in Forbes Industrial Park, within a lightly developed agricultural/residential/industrial region of Prince George, Virginia. The industrial park is located along Route 156, approximately 20 miles southeast of Richmond, Virginia, and within 0.5 mile of the Hopewell city limits. The site is topographically relatively flat and lies at an elevation of approximately 130 feet above mean sea level. There are no waterways or wetlands on the site. A surface water impoundment is located on the adjacent property east of the facility site; the surface impoundment receives stormwater from the Clean Harbors facility and other adjacent properties in the Forbes Industrial Park.

There are two buildings located on the northwest portion of the site. The larger building is a 5,000 square-foot one story metal building which houses a former laboratory, a boiler, and general maintenance equipment and supplies. The second building is comprised of two large trailers and is used as office space.

A 5,000-gallon diesel aboveground storage tank (AST) is located west of the main building, and currently contains fuel for equipment and vehicles. One inactive hazardous waste AST and four inactive non-hazardous waste ASTs are located in a concrete-lined tank farm located southeast of the main building. The AST tank farm was RCRA “clean closed” in 2001. Two 20,000-gallon fractionation (frac) tanks are located southwest of the tank farm, and are used to temporarily hold stormwater that collects in the tank farm and an adjacent containment dike.

The active portion of the site, where treatment and storage of hazardous waste has occurred, is located on the southern portion of the property and is completely enclosed by a chain-link fence. A 60-foot by 65-foot concrete pad is located on the eastern portion of the site and is currently used to park box trailers, where truck to truck transfer operations occur. Empty roll-off containers are stored along the southern fence line of the site. West of the roll-off containers are large capacity decommissioned ASTs awaiting disposal. A large metal solidification pan, currently not in use, is stored adjacent to these ASTs. North of this area is a sea van used for storage of supplies, and northwest of the sea van is a storage shed and canopy used for additional storage of spill response supplies. With the exception of the concrete pad, the tank farm and containment dike, the site is unpaved and covered with gravel, soil, or vegetation.

During CWM’s operation of the facility, solid and hazardous waste treatment and storage was conducted in two areas: in the AST tank farm and on the concrete pad in the eastern portion of the facility. During Clean Harbors operation, hazardous waste processes continued in the tank farm until 2001, when the AST tank farm was “clean closed” under the RCRA. Oily sludge was solidified in a solidification pan on the concrete pad, and this operation ceased in 2004. Currently truck-to-truck transfer of containerized waste occurs on the concrete pad. These wastes are subsequently transported off-site for treatment and/or disposal at appropriate facilities.

The Clean Harbors facility is on the RCRA CA GPRA Baseline List (2020 CA universe List) and was ranked as a low priority site under the National Corrective Action Prioritization System (NCAPS).

In Virginia, the EPA and the Virginia Department of Environmental Quality (DEQ) have conducted CA site assessments and evaluations of facilities on the 2020 CA Universe List, which were ranked medium, low, or unranked under NCAPS. The facility site assessments and evaluations have been conducted with primary assistance from an EPA contracted consultant. The evaluations and findings in the CA site assessment are documented in a Final RCRA CA Site Visit Report for the subject facility.

The facility specific Final CA Site Visit Report is essentially a Phase I Site Assessment Report, which includes facility information documented from the site visits, site meetings, and the administrative record established from file searches of the DEQ's Central Office, Office of Hazardous Waste (OHW) files, the DEQ's Regional Office files (all media), and the EPA's RCRA files or records.

The Final CA Site Visit Report provides an inventory of a facility's hazardous waste management units (HWMUs), Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs), a preliminary assessment of the HWMUs, SWMUs and AOCs based upon the evaluation and findings of the researched administrative record, the site visit, engineered controls, available environmental data, waste characteristics, the past regulatory oversight of operations, and documented closure of HWMUs, SWMUs and AOCs, and the perceived potential risk to human health and the environment posed by the facility from actual or potential releases of hazardous waste or hazardous constituents to the environment, potential migration pathways, potential target receptors, etc.

In Virginia, the Final CA Site Visit Report will be a primary basis to determine if many of the facilities on the 2020 CA Universe List would need a CA investigation to assess potential releases of hazardous waste or hazardous constituents from the facility's HWMUs, SWMUs, or AOCs or if the EPA and the DEQ may recommended No-further Action (NFA) for CA for the site under the RCRA Regulations.

On August 30, 2005, a CA site visit was performed by the EPA, the DEQ, the U.S. Army Corps. of Engineers (the EPA contracted consultant), and representatives of Clean Harbors to assess and evaluate the facility site regarding the potential need for CA.

A *Final RCRA CA Site Visit Report*, dated January 23, 2006, was submitted to the EPA and DEQ, by the U.S. Army Corps. of Engineers.

RCRA CA Milestones

To date the following RCRA CA milestones have been completed at the Clean Harbors facility in Prince George, Virginia:

- **8/30/05** – Meeting and CA Site Visit was conducted at the Clean Harbors facility in Price George, Virginia between representatives from EPA Region III, DEQ, USACE, and Clean Harbors. The purpose of meeting and CA Site Visit was to discuss the Resource Conservation and Recovery Act (RCRA) Corrective Action (CA) Program and the Facility Lead Agreement (FLA), perform a site assessment of the facility, and identify hazardous waste management units (HWMUs), solid waste management units (SWMUs), areas of concern (AOCs) at the site.
- **1/23/06** – RCRA Site Visit Report, prepared by the US Army Corps of Engineers for the Clean Harbors facility.
- **12/6/06** – Facility Lead Agreement (FLA) invitation letter from EPA Region III for the Clean Harbors facility.
- **1/5/07** – Facility Lead Agreement (FLA) Letter of Commitment from Clean Harbors.
- **4/11/07** – Meeting conducted at the Clean Harbors facility between representatives from DEQ and Clean Harbors. Purpose of meeting was to discuss requirements of FLA and the upcoming RCRA Facility Investigation (RFI).
- **7/12/07** – Submittal of RFI Work Plan for the Clean Harbors facility.
- **9/27/07** – RFI Work Plan Technical Review Comment Letter issued by the DEQ.
- **12/13/07** – Conference call conducted between representatives from DEQ and Clean Harbors to discuss RFI Work Plan and Technical Comments Letter. An extension of the submittal of the revised RFI Work Plan was requested by the facility. The DEQ granted the extension of the submittal of the revised RFI Work Plan to February 15, 2008, by correspondence, dated December 19, 2007. An additional extension was requested by the facility in a letter, dated February 11, 2008. The DEQ granted the additional extension of the submittal of the revised RFI Work Plan to March 17, 2008, by correspondence, dated February 19, 2007.
- **3/14/08** – Submittal of revised RFI Work Plan for the Clean Harbors facility.
- **5/23/08** – Revised RFI Work Plan Technical Review Comment Letter issued by the DEQ.

- **7/9/08** – Conference call conducted between representatives from the DEQ and Clean harbors to discuss technical comments on revised RFI Work Plan.
- **7/10/08** – Clean Harbors submitted an extension request to submit a response to the DEQ's technical comments on the revised RFI Work Plan.
- **7/16/08** – DEQ approved an extension to submit a response to the technical comments on the revised RFI Work Plan. Extension granted until August 25, 2008.
- **8/28/08** – Clean Harbors submitted another extension request to submit a response to the DEQ's technical comments on the revised RFI Work Plan.
- **9/5/08** – DEQ approved an extension to submit a response to the technical comments on the revised RFI Work Plan. Extension granted until September 20, 2008.
- **9/9/08** – Submittal of Comment-by-Comment Response to technical comments on revised RFI Work Plan.
- **12/9/08** – Response letter to Comment-by-Comment Response issued by DEQ. The DEQ requested Clean Harbors to incorporate comments and submit final RFI Work Plan within 45 days of receipt of the letter.

Details and supporting documentation can be obtained by reviewing the files at the DEQ's Central Office or by contacting the DEQ project manager identified in this fact sheet.

Environmental Indicator Status

Under the Government Performance and Results Act (GPRA), EPA has set national goals to address high priority RCRA Corrective Action facilities by the year 2008, and medium and low priority RCRA Corrective Action facilities by the year 2020. EPA is evaluating two key Environmental Indicators (EIs) for each facility: Current Human Exposures Under Control and Migration of Contaminated Groundwater Under Control. This facility is one of EPA Region III's medium/low priority facilities and falls under this GPRA initiative.

Virginia's current evaluation of Environmental Indicators for this facility is as follows:

- *Human Exposures Controlled Determination:* The DEQ has not yet made a Human Health Environmental Indicators (HHEI) determination. Additional information is needed to formally determine if current human exposures are controlled.
- *Release to Groundwater Controlled Determination:* The DEQ has not yet made a Groundwater Environmental Indicators (GWEI) determination. Additional information is needed to formally determine if Groundwater Releases are controlled.

Contaminants

Additional site assessment and/or investigation is necessary to determine if contamination is present in the soils, subsoils, and groundwater at the Clean Harbors facility.

Institutional Controls

Clean Harbors entered into a Facility Lead Agreement (FLA) in January 2007 with the US EPA and committed to conducting investigation and remediation activities in accordance with the EPA Region III Facility Lead Corrective Action Program under RCRA.

The CA investigations and any necessary clean up activities at the facility are being implemented in accordance with the conditions and requirements of the FLA under the technical and administrative oversight of the DEQ.

Community Involvement

A copy of all documents relating to the RCRA CA program at this facility are available for viewing at DEQ's Central Office located at 629 East Main Street in Richmond, Virginia. Additionally, an Administrative Record will be made available at a local repository at an appropriate future date to give the community access to the CA related documentation.

The FLA requires that the facility to conduct effective public involvement and that the facility develop a Community Relations Plan (CRP), which describes how the facility will conduct public involvement activities to inform the local community, the State (Commonwealth), and any other interested parties of activities throughout the corrective action process.

The EPA will issue a public notice of a tentative determination and solicit comments prior to making a final Agency determination regarding final corrective action remedies at the facility.

Government Contacts

The Commonwealth of Virginia has the lead CA authority for this project. Please contact the DEQ project manager listed below for details on this project or the contents of this factsheet.

DEQ Project Manager

Ryan J. Kelly
Environmental Engineer
Department of Environmental Quality
629 East Main Street
P.O. Box 1105
Richmond, VA 23218
Phone: (804) 698-4045
Fax: (804) 698-4234
Email: rjkelly@deq.virginia.gov

EPA Project Manager

Mr. Mike Jacobi – 3LC20
U.S. Environmental Protection Agency - Region III
1650 Arch Street
Philadelphia, PA 19103-2029
Phone: (215) 814-3435
Email: jacobi.mike@epa.gov

For more information about EPA's CA program, including Environmental Indicators, please visit EPA's website at: www.epa.gov/reg3wcmd/correctiveaction.htm.

Facility Contact

Mr. Charles J. McCreery, CPG, LSP
Senior Project Manager
Clean Harbors Environmental Services, Inc.
42 Longwater Drive
P.O. Box 9149
Norwell, MA 02061-9149
Phone: (781) 792-5823
Email: mccreery@cleanharbors.com

Fact Sheet Update

The previous fact sheet was updated July 2008. The next fact sheet update is scheduled for July 2009. Previous fact sheets may be obtained through the listed DEQ contact.